

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

ELVIS MOODIE, RAYON FISHER,  
DESMOND ELLIS, and  
KEISHA COLLINS-ENNIS, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

KIAWAH ISLAND INN COMPANY, LLC,  
d/b/a KIAWAH ISLAND GOLF RESORT,

Defendant.

Case No. 2:15-cv-01097-RMG

**DECLARATION OF SARAH M. RICH**

1. I am a Staff Attorney at the Southern Poverty Law Center (“SPLC”) and one of Plaintiffs’ attorneys (and Class Counsel) in this matter.

2. I am admitted to practice in the state courts of Georgia, California, and Texas; the U.S. District Courts for the Northern District of Georgia and the Western District of Texas; and the United States Court of Appeals for the Eleventh Circuit. I earned my Juris Doctor degree from the University of California, Berkeley School of Law and was awarded the Order of the Coif in 2011. I was admitted to practice in California that same year, in Texas in 2013, and in Georgia in 2015. I served as a law clerk to the Honorable Richard A. Paez of the United States Court of Appeals for the Ninth Circuit from August 2011 until September 2012.

3. During my legal career, I have represented hundreds of clients in class action and other complex litigation.


4. I am currently a Staff Attorney at the Southern Poverty Law Center’s Immigrant Justice Project, where I have worked since August 2014. From October 2012 through July 2014, I worked as a Staff Attorney at Texas RioGrande Legal Aid, Inc. in El Paso, Texas, with a focus on migrant farmworker cases.

5. During the course of this litigation, I have kept contemporaneous time records related to my work on this case. Those time records are recorded in SPLC's computerized document management and timekeeping software during the normal course and scope of my work. My time records related to this case are attached to this Declaration as Exhibit A.

6. James Knoepp, who is the most senior attorney from SPLC assigned to this case, added fields to Exhibit A for my proposed rate, the total lodestar for each entry, and the notes field. Mr. Knoepp, in his role as senior attorney from SPLC on this case, has reviewed my time records and eliminated certain entries in the exercise of billing judgment. Those reductions in the lodestar associated with my work on the case are reflected in the attached Exhibit A, both in the "Total" field and the "Notes" field for each row.

7. Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I declare that the foregoing facts are true and correct to the best of my knowledge.

Dated: December 2, 2016

  
\_\_\_\_\_  
Sarah M. Rich

Date	Description	Staff	Dur/Oty	Proposed Rate	Amount	Notes
3/10/2015	Prepared pro hac vice motion and application	Rich	0.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
8/26/2015	Converting 3 Plaintiffs' rog & RFP responses to optimized PDFs	Rich	0.3	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/1/2015	Meeting and deposition preparation with four clients	Rich	2	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/1/2015	Travel to/from meeting with clients at Gardens apartments	Rich	0.2	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/1/2015	Travel from Atlanta to Charleston	Rich	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/2/2015	Defend depositions of four clients	Rich	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/2/2015	Travel time to pick up clients and take them to deposition	Rich	0.6	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/2/2015	Travel from Charleston to Atlanta	Rich	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/5/2015	Emailed co-counsel re sending wrong class notice, attaching correct version	Rich	0.1	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/5/2015	Verified which class notice I sent to co-counsel for filing	Rich	0.1	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/19/2015	Updated template for filings with Georgia bar info	Rich	0.1	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
12/14/2015	Second-chaired deposition of Beverly Wall	Rich	2	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
12/15/2015	Second-chaired deposition of Jackie Regan	Rich	4.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
12/17/2015	Conference call with ML, JK, opposing counsel re payroll issues, scheduling depositions and mediation	Rich	0.7	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
12/18/2015	Conference call with opposing counsel re ongoing discovery issues	Rich	0.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
11/2/2016	Second-chaired deposition of Karia Bujak	Rich	5.8	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/13/2016	Participated in mediation	Rich	8.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/13/2016	Travel from hotel to mediation	Rich	0.3	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/18/2016	Travel from Atlanta to Charleston for J. Bozard deposition	Rich	5.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/19/2016	Travel from Charleston to Atlanta following J. Bozard deposition	Rich	6.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/19/2016	Second-chaired J. Bozard deposition	Rich	8	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/19/2016	Travel from hotel to deposition location	Rich	0.3	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/19/2016	Printing and organizing documents for J. Bozard deposition	Rich	1	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/29/2016	Second-chaired defense of Desmond Ellis	Rich	3	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
2/2/2016	Second-chaired 30(b)(6) depo of Kiawah (Jennifer Bozard)	Rich	1.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
2/3/2016	Second-chaired deposition of Roger Warren	Rich	2.5	\$0.00	\$0.00	Eliminated in the exercise of billing judgment
1/22/2015	Drafting original complaint	Rich	3.8	\$275.00	\$1,045.00	
1/23/2015	Meeting w/ CIM to discuss pre-filing steps, tasks for her to do (damages calculations, contacting clients)	Rich	0.2	\$275.00	\$55.00	
1/23/2015	Researching SCPWA and FLSA claims	Rich	3.3	\$275.00	\$907.50	
1/23/2015	Drafting complaint	Rich	0.5	\$275.00	\$137.50	
1/26/2015	Research FLSA collective actions - procedure for filing and pitfalls	Rich	1	\$275.00	\$275.00	
1/27/2015	Drafting complaint	Rich	1	\$275.00	\$275.00	
1/27/2015	Research into recruitment and other facts for drafting of complaint	Rich	2.2	\$275.00	\$605.00	
2/26/2015	Reviewed local rules in D.S.C. for any deadlines or other issues around filing	Rich	0.2	\$275.00	\$55.00	
2/26/2015	Drafted complaint	Rich	1.3	\$275.00	\$357.50	
2/27/2015	Research on SC breach of contract law	Rich	1.3	\$275.00	\$357.50	
2/27/2015	Worked on pro hac vice application for D.S.C.	Rich	0.5	\$275.00	\$137.50	
2/27/2015	Convo with JK re: changes to make to complaint draft, legal theories to include	Rich	0.2	\$275.00	\$55.00	
2/27/2015	Phone call with JK, ML, and potential local counsel in SC Nancy Bloodgood	Rich	0.4	\$275.00	\$110.00	
3/2/2015	Edited draft complaint per JK's suggestions and additional info from CIM, DP	Rich	3	\$275.00	\$825.00	
3/5/2015	Drafting complaint in response to edits, suggestions from JK, ML	Rich	3.5	\$275.00	\$962.50	
3/6/2015	Research re Anderson v Sara Lee (4CA)	Rich	1.2	\$275.00	\$330.00	
3/9/2015	Team meeting re service of process, class & collective action motions, media outreach with JK, ML, DP, CIM	Rich	0.6	\$275.00	\$165.00	
3/9/2015	Drafted class action conditional certification motion	Rich	0.8	\$275.00	\$220.00	
3/9/2015	Drafted FLSA collective action conditional certification motion	Rich	0.3	\$275.00	\$82.50	
3/10/2015	Research FLSA collective action case law in Fourth Circuit, D.S.C.	Rich	1	\$275.00	\$275.00	
3/10/2015	Drafted FLSA collective action declaration for Elvis Moodie	Rich	1.1	\$275.00	\$302.50	
3/11/2015	Drafted FLSA collective action conditional certification memo	Rich	2.6	\$275.00	\$715.00	
3/11/2015	E-mails with DP, CIM re declaration drafts for named plaintiffs	Rich	0.2	\$275.00	\$55.00	
3/11/2015	Edited declaration draft for Elvis Moodie	Rich	0.8	\$275.00	\$220.00	
3/12/2015	Drafted memo in support of motion for FLSA conditional collective action certification	Rich	4.5	\$275.00	\$1,237.50	

**PLAINTIFF'S  
EXHIBIT  
A**

3/12/2015	Emails with JK, ML, DP, CIM re plaintiff declarations	Rich	0.3	\$275.00	\$82.50
3/12/2015	Edited drafts of plaintiff declarations	Rich	0.8	\$275.00	\$220.00
3/13/2015	Drafting collective action conditional certification memo including legal research	Rich	2.5	\$275.00	\$687.50
3/13/2015	Editing drafts of plaintiffs' declarations	Rich	0.7	\$275.00	\$192.50
3/16/2015	Researched and began drafting memo in support of motion for class action certification	Rich	3.5	\$275.00	\$962.50
3/16/2015	Finished draft of memo in support of motion for collective action conditional certification	Rich	1.4	\$275.00	\$385.00
3/17/2015	Finalized draft of memo in support of motion for class certification	Rich	5.5	\$275.00	\$1,512.50
3/18/2015	Drafted proposed FLSA collective action notice	Rich	1.5	\$275.00	\$412.50
3/19/2015	Prepared new draft of memo on collective action conditional cert per ML's edits	Rich	1	\$275.00	\$275.00
3/25/2015	Researched duty to consult before filing motions in D.S.C. local rules	Rich	0.1	\$275.00	\$27.50
3/27/2015	Conference call with ML, CIM and cl Desmond Ellis to discuss serving process on Kiawah and next steps in case	Rich	0.1	\$275.00	\$27.50
3/27/2015	Conference call with ML, DP, CIM and cl Rayon Fisher to discuss impending service of process, possible media coverage	Rich	0.3	\$275.00	\$82.50
4/2/2015	Edited proposed notice for FLSA collective action per ML's suggestions	Rich	0.1	\$275.00	\$27.50
4/2/2015	Edited motion for class action certification per ML's suggestions	Rich	0.1	\$275.00	\$27.50
4/2/2015	Edited motion for FLSA collective action certification per ML's suggestions	Rich	0.2	\$275.00	\$55.00
4/6/2015	Edited memo in support of motion for FLSA collective action certification per JK's suggestions	Rich	1.9	\$275.00	\$522.50
4/6/2015	Edited proposed notice for FLSA collective action per JK's suggestions	Rich	0.1	\$275.00	\$27.50
4/6/2015	Edited motion for conditional certification of class action per JK's suggestions	Rich	0.05	\$275.00	\$13.75
4/7/2015	Edited memo in support of motion for class action cert per ML's suggestions	Rich	2.75	\$275.00	\$756.25
7/12/2015	Reviewed Defendant's interrogatories and RFPs issued to Plaintiffs	Rich	0.4	\$275.00	\$110.00
7/12/2015	Prepared eleventh notice of filing FLSA consent forms for Simmonds, Spence and Johnson opt-ins	Rich	0.5	\$275.00	\$137.50
7/22/2015	Prepared responses and objections to Defendant's first set of RFPs	Rich	2	\$275.00	\$550.00
7/22/2015	Meeting with ML, JK to discuss production of FLECTS subpoena documents to opposing counsel	Rich	0.1	\$275.00	\$27.50
7/22/2015	Meeting with Michelle Lapointe to discuss status of case and plan for discovery	Rich	0.4	\$275.00	\$110.00
7/23/2015	Reviewed FLECTS documents produced in response to subpoena	Rich	4.7	\$275.00	\$1,292.50
7/23/2015	Phone call to FLECTS GM Joseph Hobbs re production of ESI in response to subpoena	Rich	0.2	\$275.00	\$55.00
7/24/2015	Discuss with Carmen and Michelle responding to Kiawah discovery served on Plaintiffs	Rich	0.2	\$275.00	\$55.00
7/24/2015	Prepared checklist of requests for calls with clients to prepare rog & RFP responses	Rich	0.5	\$275.00	\$137.50
7/24/2015	Finished initial review of documents produced by FLECTS in response to subpoena	Rich	0.4	\$275.00	\$110.00
7/27/2015	Reviewed documents in database for eventual production in response to RFPs	Rich	0.5	\$275.00	\$137.50
7/27/2015	Prepared responses and objections to RFPs	Rich	0.3	\$275.00	\$82.50
7/27/2015	Phone call with FLECTS GM Joseph Hobbs re ESI production in response to subpoena	Rich	0.1	\$275.00	\$27.50
7/27/2015	Phone call with ML re deadline for answering rogs/RFPs	Rich	0.1	\$275.00	\$27.50
7/29/2015	Created and began working on claims and evidence analysis chart	Rich	0.3	\$275.00	\$82.50
7/29/2015	Various e-mails with JK, ML, Jenna from IT re FLECTS's ESI production	Rich	0.2	\$275.00	\$55.00
7/29/2015	Researched ESI production standards	Rich	0.4	\$275.00	\$110.00
7/29/2015	Phone call with FLECTS employee Perry Wells re ESI production in response to subpoena	Rich	0.3	\$275.00	\$82.50
7/29/2015	Finished initial review of all documents in database for RFP responses	Rich	0.3	\$275.00	\$82.50
7/29/2015	Finalized questions for clients to respond to RFPs, updated draft responses and objections to RFPs	Rich	0.8	\$275.00	\$220.00
7/30/2015	Edited ML's draft questions for clients' rog responses	Rich	0.2	\$275.00	\$55.00
7/30/2015	Meeting with ML, CIM re contacting clients for rog/RFP responses	Rich	0.5	\$275.00	\$137.50
7/31/2015	Phone call with Plaintiff Keisha Collins-Ennis to gather info for interrogatory responses	Rich	1.8	\$275.00	\$495.00
7/31/2015	Various e-mails with ML, JK, Nancy Bloodgood re D's proposed confidentiality order	Rich	0.2	\$275.00	\$55.00
7/31/2015	Reviewed draft confidentiality statement and attachments	Rich	0.2	\$275.00	\$55.00
7/31/2015	Drafted letter to FLECTS re deficiencies in subpoena production	Rich	1.5	\$275.00	\$412.50
8/3/2015	Finalizing and sending letter to FLECTS's counsel re ESI production	Rich	0.4	\$275.00	\$110.00
8/3/2015	Phone call from client Desmond Ellis, discussed responding to rogs/RFPs	Rich	0.1	\$275.00	\$27.50
8/3/2015	Phone call from FLECTS's counsel re ESI production	Rich	0.1	\$275.00	\$27.50
8/3/2015	Edited letter re FLECTS's ESI production to send to attorney	Rich	0.2	\$275.00	\$55.00
8/3/2015	Phone call with FLECTS's counsel re ESI production in response to subpoena	Rich	0.2	\$275.00	\$55.00
8/4/2015	Various e-mails with ML re objections to rogs/RFPs	Rich	0.1	\$275.00	\$27.50
8/4/2015	Phone call with cl Desmond Ellis re rog/RFP responses	Rich	2	\$275.00	\$550.00
8/4/2015	Meeting with ML to discuss order granting & denying motion to dismiss	Rich	0.2	\$275.00	\$55.00



8/4/2015	Reviewed order granting in part and mostly denying motion to dismiss	Rich	0.3	\$275.00	\$82.50
8/5/2015	Drafted, sent e-mail to Morris Kietzkin re serving JCLO with subpoena	Rich	0.1	\$275.00	\$27.50
8/5/2015	Analysis of documents responsive to Def's RFPs	Rich	1	\$275.00	\$275.00
8/5/2015	Research re how to serve subpoena on JCLO	Rich	0.4	\$275.00	\$110.00
8/5/2015	Drafted subpoena and attachment to Jamaica Central Labour Organisation	Rich	0.6	\$275.00	\$165.00
8/5/2015	Discussion with ML, JK re paycheck deductions and SCPWA	Rich	0.2	\$275.00	\$55.00
8/5/2015	Factual research on deductions from plaintiffs' paychecks	Rich	0.2	\$275.00	\$55.00
8/5/2015	Phone call with FLECTS attorney to discuss ESI production and redaction of proprietary information	Rich	0.1	\$275.00	\$27.50
8/6/2015	Analysis of legal claims, damages, and evidence following Judge's Order on Motion to Dismiss	Rich	1.3	\$275.00	\$357.50
8/6/2015	Edited JCLO subpoena attachment per ML's suggestions	Rich	0.2	\$275.00	\$55.00
8/6/2015	Compiled list of FOIA documents to include in RFP responses	Rich	0.2	\$275.00	\$55.00
8/6/2015	Edited draft of Elvis Moodie's responses and objections to RFPs	Rich	0.3	\$275.00	\$82.50
8/7/2015	Phone call with opt-in plaintiff Jeffrey Bent re electricity charges and return transport charges in his paycheck	Rich	0.2	\$275.00	\$55.00
8/7/2015	Discussed proposed confidentiality agreement with JK	Rich	0.2	\$275.00	\$55.00
8/10/2015	Meeting with ML, CIM & intern to discuss progress on rog & RFP responses and other case developments	Rich	0.5	\$275.00	\$137.50
8/10/2015	Phone call with plaintiff Desmond Ellis to follow up on documents needed for rog/RFP responses	Rich	0.1	\$275.00	\$27.50
8/11/2015	Drafted e-mail to JCLO counsel Morris Kietzkin to ask for documents	Rich	0.1	\$275.00	\$27.50
8/11/2015	Phone call with Morris Kietzkin, JCLO's attorney, re providing documents	Rich	0.1	\$275.00	\$27.50
8/11/2015	Drafted, sent e-mail to opposing counsel re deadline to submit proposed amended scheduling order and request for extension	Rich	0.1	\$275.00	\$27.50
8/11/2015	Reviewed Kiawah's responses & objections to rogs, RFPs	Rich	0.5	\$275.00	\$137.50
8/11/2015	Phone call from Plaintiff Desmond Ellis to discuss rog/RFP responses	Rich	0.1	\$275.00	\$27.50
8/13/2015	Started reviewing documents produced by Kiawah in response to RFPs	Rich	0.5	\$275.00	\$137.50
8/13/2015	Created PDFs of all FLA collective action notice documents for emailing to potential clients	Rich	0.1	\$275.00	\$27.50
8/13/2015	Various e-mails with JK, CIM, ML re logistics of FLA collective action notice mailing	Rich	0.2	\$275.00	\$55.00
8/13/2015	Discussion with CIM and Gaby Maxcy re mail merge for FLA collective action notice	Rich	0.2	\$275.00	\$55.00
8/13/2015	Drafted email to FLECTS's counsel with questions on labels and values in Excel spreadsheet they produced in response	Rich	0.7	\$275.00	\$192.50
8/13/2015	Reviewed FLECTS's Excel spreadsheet	Rich	0.3	\$275.00	\$82.50
8/13/2015	Drafted letter to Kiawah's counsel re discovery deficiencies	Rich	1.8	\$275.00	\$495.00
8/13/2015	Drafted Notice of Completion of Mailing FLA Collective Action Notices	Rich	0.2	\$275.00	\$55.00
8/13/2015	Updated FLA notice of right to sue based on court's order ECF No. 47	Rich	0.8	\$275.00	\$220.00
8/14/2015	Continued drafting letter to Kiawah's counsel re discovery deficiencies	Rich	0.5	\$275.00	\$137.50
8/14/2015	Meeting with JK re Kiawah's production in response to RFPs and deficiencies therein	Rich	0.3	\$275.00	\$82.50
8/14/2015	Sent proposed consent amended scheduling order to co-counsel for filing via CM/ECF	Rich	0.1	\$275.00	\$27.50
8/14/2015	Edited proposed consent amended scheduling order per opposing counsel's request	Rich	0.1	\$275.00	\$27.50
8/14/2015	E-mails with opposing counsel re proposed consent amended scheduling order	Rich	0.1	\$275.00	\$27.50
8/14/2015	Emailled opposing counsel with draft proposed consent amended scheduling order for their approval	Rich	0.1	\$275.00	\$27.50
8/14/2015	Drafted proposed consent amended scheduling order	Rich	0.3	\$275.00	\$82.50
8/14/2015	Discussion with ML on proposed amended scheduling order	Rich	0.1	\$275.00	\$27.50
8/17/2015	Reviewed Kiawah's discovery documents in EScanIT	Rich	1.3	\$275.00	\$357.50
8/17/2015	Reviewed Kiawah's discovery documents produced in response to rogs/RFPs	Rich	4	\$275.00	\$1,100.00
8/17/2015	Sent finalized Notice of Completion of Mailing FLA Notices to co-counsel for filing	Rich	0.1	\$275.00	\$27.50
8/17/2015	Finalized notice of completion of mailing FLA collective action notices	Rich	0.1	\$275.00	\$27.50
8/18/2015	Various emails with ML, JK, CIM re documents for rog and RFP responses	Rich	0.2	\$275.00	\$55.00
8/18/2015	Discussion with JK re separation of documents in EScanIT for transfer to Xera	Rich	0.1	\$275.00	\$27.50
8/18/2015	Discussion with ML re damages under contract claim	Rich	0.1	\$275.00	\$27.50
8/18/2015	Reviewed Kiawah's discovery documents in EScanIT to create document breaks	Rich	1	\$275.00	\$275.00
8/19/2015	Drafted Desmond Ellis's responses to rogs/RFPs	Rich	1.1	\$275.00	\$302.50
8/19/2015	Discussion with ML re theories of damages	Rich	0.2	\$275.00	\$55.00
8/19/2015	Drafted Keisha Collins-Ennis's responses and objections to rogs and RFPs	Rich	1.8	\$275.00	\$495.00
8/19/2015	Meeting with JK, ML, CIM to plan for producing rog & RFP responses	Rich	0.8	\$275.00	\$220.00
8/19/2015	Reviewed plaintiffs' documents, coded for responsiveness for RFP responses	Rich	0.5	\$275.00	\$137.50
8/25/2015	Research re qualified privilege for tax returns in 4th Circuit	Rich	0.4	\$275.00	\$110.00
8/25/2015	Edited draft model RFP responses per JK's edits and suggestions	Rich	0.4	\$275.00	\$110.00

8/25/2015	Various e-mails with ML and CIM re Desmond Ellis's rog and RFP responses	Rich	0.2	\$275.00	\$55.00
8/25/2015	Edited Keisha Collins-Ennis's rog responses	Rich	0.3	\$275.00	\$82.50
8/25/2015	Edited Desmond Ellis's interrogatory responses	Rich	0.8	\$275.00	\$220.00
8/25/2015	Edited Rayon Fisher's interrogatory responses	Rich	0.4	\$275.00	\$110.00
8/25/2015	Edited Desmond and Keisha rog responses	Rich	1	\$275.00	\$275.00
8/26/2015	Meeting with JK, ML, CIM to discuss final steps in preparing rog and RFP responses and documents	Rich	0.2	\$275.00	\$55.00
8/26/2015	Sent notice and consent forms for opt-ins 36 and 37 to Amanda for filing	Rich	0.1	\$275.00	\$27.50
8/26/2015	Reviewed all named plaintiffs' rog and RFP responses for outstanding issues	Rich	0.3	\$275.00	\$82.50
8/26/2015	Prepared combined rog and RFP responses for Desmond Ellis	Rich	0.3	\$275.00	\$82.50
8/26/2015	Drafted Desmond Ellis RFP responses based on final production of documents	Rich	0.5	\$275.00	\$137.50
8/26/2015	Prepared combined RFP and rog response document for Keisha Collins-Ennis	Rich	0.2	\$275.00	\$55.00
8/26/2015	Drafted Keisha Collins-Ennis's RFP responses based on final production of documents	Rich	0.5	\$275.00	\$137.50
8/26/2015	Discussion with CIM re documents received from Rayon Fisher and Desmond Ellis	Rich	0.1	\$275.00	\$27.50
8/26/2015	Discussion with ML re finalizing RFP and rog responses	Rich	0.1	\$275.00	\$27.50
8/26/2015	Drafted Rayon Fisher RFP responses based on final set of production documents	Rich	0.5	\$275.00	\$137.50
8/26/2015	Drafted Elvis Moodie RFP responses based on final set of production documents	Rich	0.4	\$275.00	\$110.00
8/26/2015	Edited draft model RFP responses per JK's and ML's suggestions	Rich	0.5	\$275.00	\$137.50
8/26/2015	Meeting with ML to discuss RFP document production	Rich	0.1	\$275.00	\$27.50
8/26/2015	Meeting with JK to discuss RFP production sets and Kiawah's document production	Rich	0.4	\$275.00	\$110.00
8/27/2015	Creating document types for coding purposes for FLECTS subpoena docs	Rich	1.3	\$275.00	\$357.50
8/27/2015	Meeting with ML, JK, CIM to discuss discovery issues	Rich	1	\$275.00	\$275.00
8/27/2015	Document coding planning meeting with JK, ML, CIM and Emily	Rich	1	\$275.00	\$275.00
9/4/2015	Prepared notice of joinder and opt-in forms, sent to co-counsel for filing	Rich	0.4	\$275.00	\$110.00
9/4/2015	Drafted Opt-Out Form	Rich	0.2	\$275.00	\$55.00
9/4/2015	Drafted Class Notice	Rich	1	\$275.00	\$275.00
9/8/2015	Finalizing proposed class notice docs and sending to co-counsel for filing	Rich	0.5	\$275.00	\$137.50
9/8/2015	Drafted motion for approval of proposed class notice and proposed order	Rich	0.5	\$275.00	\$137.50
9/8/2015	Editing draft class notice and opt-out form per ML's suggestions	Rich	0.2	\$275.00	\$55.00
9/9/2015	Edited ML's draft First Amended Complaint	Rich	0.4	\$275.00	\$110.00
9/9/2015	Created discovery deficiencies spreadsheet	Rich	0.5	\$275.00	\$137.50
9/9/2015	Phone call with Allison Wallrapp, FLECTS's attorney	Rich	0.3	\$275.00	\$82.50
9/10/2015	E-mails with CIM re renting space for client meeting in Charleston next week (2 e-mails at 0.1 each)	Rich	0.2	\$275.00	\$55.00
9/10/2015	E-mails with CIM, ML, JK re outreach to Charleston next week (2 e-mails at 0.1 each)	Rich	0.2	\$275.00	\$55.00
9/11/2015	Email to ML, JK re Desmond Ellis responsive notes	Rich	0.1	\$275.00	\$27.50
9/11/2015	Reviewed e-mail from CIM re Desmond Ellis responsive notes follow-up	Rich	0.1	\$275.00	\$27.50
9/11/2015	Conversation with CIM re Desmond Ellis responsive notes follow-up	Rich	0.1	\$275.00	\$27.50
9/11/2015	Reviewed ML's draft privilege log	Rich	0.1	\$275.00	\$27.50
9/11/2015	E-mails (2 at 0.1 each) with CIM re next week's outreach plan	Rich	0.2	\$275.00	\$55.00
9/11/2015	Reviewed e-mail from CIM re outreach plan for next week	Rich	0.1	\$275.00	\$27.50
9/11/2015	Meeting with JK, ML re document coding	Rich	0.5	\$275.00	\$137.50
9/11/2015	Reviewed hard copies of Desmond Ellis documents for responsiveness	Rich	0.2	\$275.00	\$55.00
9/11/2015	E-mail (0.1) and discussion (0.1) with ML re Desmond Ellis responsive documents	Rich	0.2	\$275.00	\$55.00
9/11/2015	E-mail to Allison Wallrapp, FLECTS attorney, re production of responsive documents	Rich	0.5	\$275.00	\$137.50
9/11/2015	Reviewed FLECTS documents especially invoices in Xera	Rich	0.3	\$275.00	\$82.50
9/16/2015	Meeting with plaintiff Ellis Moodie	Rich	0.2	\$275.00	\$55.00
9/16/2015	Meeting with opt-in Marcus Richards	Rich	2.3	\$275.00	\$632.50
9/16/2015	Meeting with clients and potential clients	Rich	1	\$275.00	\$275.00
9/16/2015	Meeting with clients Jeffrey Bent, Raggar McFarlane, others	Rich	5.5	\$275.00	\$1,512.50
9/17/2015	Travel from Atlanta to Charleston for meeting with clients and potential clients	Rich	5.5	\$275.00	\$1,512.50
9/17/2015	Travel from Charleston, SC to Atlanta, GA	Rich	3	\$275.00	\$825.00
9/17/2015	Meeting with Kiawah opt-in clients	Rich	0.1	\$275.00	\$27.50
9/18/2015	Call from client Desmond Ellis	Rich	0.2	\$275.00	\$55.00
9/18/2015	Discussed recent outreach and follow-up, and amending complaint, with JK	Rich	0.2	\$275.00	\$55.00

9/21/2015	Researched and drafted memo in support of motion to amend and supplement	Rich	3.5	\$275.00	\$962.50
9/21/2015	Drafted proposed supplemented class notice for filing with motion to amend and supplement	Rich	0.1	\$275.00	\$27.50
9/21/2015	Drafted motion for leave to amend and supplement complaint	Rich	0.5	\$275.00	\$137.50
9/21/2015	Reviewed notice of joinder and opt-in form for new opt-in	Rich	0.1	\$275.00	\$27.50
9/21/2015	E-mails (2 at 0.1 each) with CIM re new opt-in	Rich	0.2	\$275.00	\$55.00
9/22/2015	Meeting with JK to discuss his convo with opposing counsel on motion to amend and potential settlement	Rich	0.3	\$275.00	\$82.50
9/22/2015	Reviewing e-mails (2 at 0.1 each) from JK re possible changes to amended complaint	Rich	0.2	\$275.00	\$55.00
9/22/2015	Meeting with ML, JK re Kiawah's opposition to motion for leave to amend complaint	Rich	0.1	\$275.00	\$27.50
9/22/2015	E-mails (2 at 0.1 each) to JK, ML re other possible changes to amended-supplemented complaint	Rich	0.2	\$275.00	\$55.00
9/22/2015	Created comparison of original and amended-supplemented complaint and reviewed it	Rich	0.2	\$275.00	\$55.00
9/22/2015	Reviewed Kiawah's proposed class notice and opt-out form	Rich	0.1	\$275.00	\$27.50
9/23/2015	Edited memo in support of motion for leave to amend & supplement per JK's suggestions	Rich	0.3	\$275.00	\$82.50
9/23/2015	Edited motion for leave to amend and supplement per JK's suggestions	Rich	0.2	\$275.00	\$55.00
9/23/2015	Reviewed and coded documents produced by FLECTS	Rich	2	\$275.00	\$550.00
9/23/2015	Edited first amended complaint and created redlined version	Rich	0.4	\$275.00	\$110.00
9/24/2015	Coding FLECTS subpoena docs in Xera	Rich	1.3	\$275.00	\$357.50
9/24/2015	Finalized motion for leave to amend and supporting exhibits, sent to co-counsel for filing	Rich	0.4	\$275.00	\$110.00
9/25/2015	Coded FLECTS documents in Xera	Rich	1.5	\$275.00	\$412.50
9/28/2015	E-mails (2 at 0.1 each) from and to JK re: meeting agendas produced by Kiawah	Rich	0.2	\$275.00	\$55.00
9/28/2015	Reviewed new docs produced by Kiawah	Rich	0.4	\$275.00	\$110.00
9/28/2015	Discussed new docs provided by Kiawah with ML, JK	Rich	0.1	\$275.00	\$27.50
9/29/2015	Meeting with JK, ML, CIM re coding documents, discovery issues	Rich	1	\$275.00	\$275.00
9/30/2015	Coded documents in Xera	Rich	0.3	\$275.00	\$82.50
9/30/2015	Coded documents in Xera	Rich	1.7	\$275.00	\$467.50
10/1/2015	Coded documents in Xera	Rich	0.8	\$275.00	\$220.00
10/2/2015	Researched and drafted letter to opposing counsel on discovery disputes conversation	Rich	2.4	\$275.00	\$660.00
10/2/2015	Call with opposing counsel and ML to discuss discovery disputes	Rich	0.8	\$275.00	\$220.00
10/2/2015	Meeting with ML to prepare for call with opposing counsel	Rich	0.3	\$275.00	\$82.50
10/8/2015	Coded documents in Xera	Rich	1	\$275.00	\$275.00
10/9/2015	Reviewed, coded documents in Xera	Rich	2	\$275.00	\$550.00
10/9/2015	E-mailed JK, ML re setting depo schedule	Rich	0.1	\$275.00	\$27.50
10/9/2015	Sent email to CIM, ML, JK re updated opt-in notice	Rich	0.1	\$275.00	\$27.50
10/9/2015	Reviewed updated FLSA opt-in notice	Rich	0.1	\$275.00	\$27.50
10/9/2015	Reviewed, coded documents in Xera	Rich	0.5	\$275.00	\$137.50
10/9/2015	E-mails (2 at 0.1 each) with JK, ML, CIM re FLECTS charges for bus travel	Rich	0.2	\$275.00	\$55.00
10/9/2015	Call from Allison Wallrapp, FLECTS attorney, to discuss subpoena production	Rich	0.2	\$275.00	\$55.00
10/9/2015	Sent e-mail to CIM, ML, JK re opt-in #65	Rich	0.1	\$275.00	\$27.50
10/9/2015	Reviewed opt-in notice and consent form #65	Rich	0.1	\$275.00	\$27.50
10/9/2015	Sent e-mail to FLECTS attorney re: outstanding issue of payments to airlines for workers flights to US	Rich	0.1	\$275.00	\$27.50
10/9/2015	Searched FLECTS's documents for airline payments, reviewed results	Rich	0.1	\$275.00	\$27.50
10/9/2015	Email to ML, JK, CIM re FLECTS charges for Greyhound charters	Rich	0.1	\$275.00	\$27.50
10/9/2015	Read e-mail from ML re Ceridian subpoena	Rich	0.1	\$275.00	\$27.50
10/9/2015	Sent e-mails (2 at 0.1 each) to ML, JK re Ceridian subpoena	Rich	0.2	\$275.00	\$55.00
10/9/2015	Read e-mails (2 at 0.1 each) from JK re Ceridian subpoena	Rich	0.2	\$275.00	\$55.00
10/9/2015	Sent e-mail to ML, JK re: SCANA subpoena	Rich	0.1	\$275.00	\$27.50
10/9/2015	Reviewed draft subpoena to Ceridian	Rich	0.1	\$275.00	\$27.50
10/9/2015	Reviewed draft subpoena to SCANA Corp.	Rich	0.1	\$275.00	\$27.50
10/12/2015	Reviewed, coded documents in Xera	Rich	0.5	\$275.00	\$137.50
10/12/2015	Researched discoverability of tax returns	Rich	0.4	\$275.00	\$110.00
10/12/2015	Read letter from opposing counsel on discovery issues	Rich	0.1	\$275.00	\$27.50
10/13/2015	Reviewed, coded documents in Xera	Rich	1.2	\$275.00	\$330.00
10/13/2015	Meeting with ML, JK to discuss potential settlement demand	Rich	0.4	\$275.00	\$110.00
10/13/2015	Reviewed, edited ML's draft response to opposing counsel re discovery disputes	Rich	0.2	\$275.00	\$55.00



10/14/2015	Began drafting reply to response to motion for leave to amend & supplement	Rich	0.5	\$275.00	\$137.50
10/14/2015	Meeting with ML to discuss division of responsibilities for reply to response to motion to amend, statement of undisputed facts	Rich	0.1	\$275.00	\$27.50
10/14/2015	Meeting with JK, ML, CIM to discuss settlement demand calculations, potential cross motions for SJ, scheduling deposition	Rich	1	\$275.00	\$275.00
10/16/2015	Edited draft reply to D's response to motion to amend/supplement per ML's additional edits	Rich	0.3	\$275.00	\$82.50
10/16/2015	Edited new draft of reply to D's response to motion to amend/supplement per ML's edits and suggestions	Rich	1	\$275.00	\$275.00
10/16/2015	Sent email to ML, JK, CIM re opposing counsel's email re discovery disputes	Rich	0.1	\$275.00	\$27.50
10/16/2015	Reviewed email from ML re opposing counsel's email re discovery disputes	Rich	0.1	\$275.00	\$27.50
10/16/2015	Reviewed email from opposing counsel re: discovery disputes	Rich	0.1	\$275.00	\$27.50
10/16/2015	Finalized draft of reply to D's response to motion to amend/supplement	Rich	0.5	\$275.00	\$137.50
10/19/2015	Sent 34th notice of filing and FLA consents for Trevor Carter and Leroy Nairne to co-counsel for filing	Rich	0.1	\$275.00	\$27.50
10/19/2015	Prepared notice of filing FLA consents for Trevor Carter and Leroy Nairne	Rich	0.2	\$275.00	\$55.00
10/19/2015	Left VM for Cherie Blackburn re: outstanding discovery issues	Rich	0.1	\$275.00	\$27.50
10/19/2015	Conference with ML, JK re discovery issues	Rich	0.2	\$275.00	\$55.00
10/20/2015	E-mails (2 at 0.1) with JK, ML, CIM re: H-2Bs and itemized tax deductions	Rich	0.2	\$275.00	\$55.00
10/20/2015	Research re: H-2Bs' ability to itemize deductions on their US income tax returns	Rich	0.9	\$275.00	\$247.50
10/20/2015	Phone call with JK, ML to debrief call with opposing counsel re discovery issues	Rich	0.3	\$275.00	\$82.50
10/20/2015	Phone call with JK, ML and opposing counsel re discovery issues	Rich	0.8	\$275.00	\$220.00
10/20/2015	Phone call with JK, ML before convo with opposing counsel re discovery issues	Rich	0.1	\$275.00	\$27.50
10/21/2015	Researched what constitutes "reasonable written notice" of deposition in D.S.C.	Rich	0.1	\$275.00	\$27.50
10/21/2015	Various e-mails re: depositions of Elvis Moodie and other opt-ins	Rich	0.3	\$275.00	\$82.50
10/21/2015	Coded documents in Xera	Rich	0.5	\$275.00	\$137.50
10/21/2015	Email to CIM re sending joinder docs to co-counsel for filing	Rich	0.1	\$275.00	\$27.50
10/21/2015	Reviewed new opt-ins' joinder docs prepared by CIM	Rich	0.1	\$275.00	\$27.50
10/22/2015	Meeting with JK, ML to discuss available dates for depositions	Rich	0.2	\$275.00	\$55.00
10/22/2015	Meeting with ML, JK, CIM to discuss tax returns issue and other discovery matters	Rich	0.1	\$275.00	\$27.50
10/22/2015	Emailed FLECTS's attorney re: document redactions	Rich	0.1	\$275.00	\$27.50
10/22/2015	Checked FLECTS documents for possible redactions	Rich	0.1	\$275.00	\$27.50
10/22/2015	Emails with JK, CIM re redaction of FLECTS documents	Rich	0.2	\$275.00	\$55.00
10/23/2015	Email to CIM approving joinder docs for filing	Rich	0.1	\$275.00	\$27.50
10/23/2015	Reviewed joinder documents for filing	Rich	0.1	\$275.00	\$27.50
10/23/2015	Telephone call with Plaintiff Elvis Moodie re tax returns, rogs, and depo prep	Rich	0.1	\$275.00	\$27.50
10/23/2015	Sent reply to response to motion for leave to amend & supplement to co-counsel for filing	Rich	0.1	\$275.00	\$27.50
10/23/2015	Finalized edits to reply to response to motion to amend & supplement	Rich	0.5	\$275.00	\$137.50
10/23/2015	Called Plaintiff Desmond Ellis, left VM	Rich	0.1	\$275.00	\$27.50
10/26/2015	Reviewed Kiawah meeting minutes	Rich	0.5	\$275.00	\$137.50
10/27/2015	Called opt-in Fayon Thomas re deposition	Rich	0.2	\$275.00	\$55.00
10/27/2015	Email to JK, ML, CIM re: whom to depose at Kiawah	Rich	0.1	\$275.00	\$27.50
10/27/2015	Reviewed and coded meeting minutes docs in Xera	Rich	1.8	\$275.00	\$495.00
10/27/2015	Sent email to CIM, JK, ML re opt-in docs for filing	Rich	0.1	\$275.00	\$27.50
10/27/2015	Reviewed opt-in docs for filing (number 80)	Rich	0.1	\$275.00	\$27.50
10/27/2015	Call to opt-in Michele Francis re deposition on Monday	Rich	0.2	\$275.00	\$55.00
10/27/2015	Called opt-in Denton Brown to discuss deposition and depo prep	Rich	0.2	\$275.00	\$55.00
10/27/2015	Sent e-mail to opposing counsel re: making sure that deponents have Monday off	Rich	0.1	\$275.00	\$27.50
10/27/2015	Called opt-in Michele Francis to discuss deposition and depo prep	Rich	0.2	\$275.00	\$55.00
10/27/2015	Email to CIM, JK, ML re notice and opt-in form for filing	Rich	0.1	\$275.00	\$27.50
10/27/2015	Reviewed opt-in notice and form for filing	Rich	0.1	\$275.00	\$27.50
10/28/2015	Email to JK, CIM re depo prep logistics	Rich	0.1	\$275.00	\$27.50
10/28/2015	Called Plaintiff Elvis Moodie re sending us photos of his tax returns, depo prep	Rich	0.1	\$275.00	\$27.50
10/28/2015	Called Plaintiff Elvis Moodie re sending us copies of his tax returns	Rich	0.1	\$275.00	\$27.50
10/28/2015	Called opt-in Denton Brown re upcoming deposition	Rich	0.1	\$275.00	\$27.50
10/28/2015	Prepared responses to modified rogs 5, 8 for Desmond, Rayon and Keisha	Rich	0.3	\$275.00	\$82.50
10/28/2015	Emailed ML, CIM, JK re draft responses to modified rogs 5, 8	Rich	0.1	\$275.00	\$27.50
10/28/2015	Drafted Elvis Moodie's written responses to modified rogs 5, 8	Rich	0.2	\$275.00	\$55.00



10/28/2015	Mtg with JK, ML to discuss requested tax returns, supplemental rogs	Rich	0.2	\$275.00	\$55.00
10/29/2015	Prepared for depositions of Elvis, Denton, Fayon, Michele - brainstormed lines of questioning	Rich	1	\$275.00	\$275.00
10/29/2015	Phone call to Elvis Moodie re getting us copies of tax returns	Rich	0.1	\$275.00	\$27.50
10/30/2015	Discussion with JK re housing overcharges, tipped workers OT rate	Rich	0.2	\$275.00	\$55.00
10/30/2015	Emails (2 at 0.1 each) to ML, JK, CIM re: plaintiffs' responses to modified rogs 5, 8	Rich	0.2	\$275.00	\$55.00
10/30/2015	Edited all Plaintiffs' responses to modified rogs 5, 8	Rich	0.2	\$275.00	\$55.00
11/3/2015	E-mail to co-counsel attaching proposed class notice, opt-out form to send to Judge Gergel per his chambers' request	Rich	0.1	\$275.00	\$27.50
11/6/2015	Sent notice of withdrawal of consent to join collective action to co-counsel for filing	Rich	0.1	\$275.00	\$27.50
11/6/2015	Prepared notice of withdrawal of consent to join collective action for Eugenie Wynter	Rich	0.2	\$275.00	\$55.00
11/6/2015	Phone convo with opt-in Eugenie Wynter re withdrawing consent to join collective action	Rich	0.2	\$275.00	\$55.00
11/9/2015	Email to Regina Jackson re mailing class notice	Rich	0.1	\$275.00	\$27.50
11/9/2015	Prepared list of topics for FLECTS 30(b)(6) depositions	Rich	0.2	\$275.00	\$55.00
11/9/2015	Prepared list of topics for Kiawah 30(b)(6) depositions	Rich	0.8	\$275.00	\$220.00
11/9/2015	Drafted notice to file with court of completion of mailing class action notices and opt-out forms	Rich	0.1	\$275.00	\$27.50
11/9/2015	Updated draft of class action opt-out form per Judge Gergel's order	Rich	0.2	\$275.00	\$55.00
11/9/2015	Updated class notice draft per Judge Gergel's order	Rich	0.3	\$275.00	\$82.50
11/9/2015	Discussion w/ JK re sending out class notice & opt-out form, and topics for 30(b)(6) depositions	Rich	0.1	\$275.00	\$27.50
11/10/2015	Emailled Notice and Opt-Out Form to Regina to coordinate with outside vendor for mailing	Rich	0.1	\$275.00	\$27.50
11/10/2015	Finalized class action notice and opt-out form with final date to opt-out	Rich	0.1	\$275.00	\$27.50
11/10/2015	Coded FLECTS documents in Xera	Rich	1.5	\$275.00	\$412.50
11/10/2015	Discussion w/ JK re Kiawah discovery production, upcoming deposition schedule	Rich	0.2	\$275.00	\$55.00
11/10/2015	Email to JK, ML attaching potential 30(b)(6) topics for Kiawah, FLECTS	Rich	0.1	\$275.00	\$27.50
11/10/2015	Edited class action notice per corrected order filed by Court	Rich	0.1	\$275.00	\$27.50
11/12/2015	Email to co-counsel sending Alison Patterson's Notice of Consent to Sue for filing	Rich	0.1	\$275.00	\$27.50
11/12/2015	Prepared Notice of filing of consent to sue for Alison Patterson	Rich	0.2	\$275.00	\$55.00
11/12/2015	Email to opposing counsel re: final mailing date of FLSA collective action notices	Rich	0.1	\$275.00	\$27.50
11/12/2015	Looked up date of completion of mailing FLSA collective action notices in response to email from opposing counsel	Rich	0.1	\$275.00	\$27.50
11/12/2015	Email to FLECTS attorney re scheduling depositions	Rich	0.1	\$275.00	\$27.50
11/12/2015	Email to opposing counsel re scheduling depositions	Rich	0.1	\$275.00	\$27.50
11/12/2015	Discussion w/ JK re: timing of depositions, contacting Kiawah's and FLECTS's attorneys to determine availability	Rich	0.1	\$275.00	\$27.50
11/16/2015	Email to JK responding to initial damages calculations, and discussing SCPWA treble damages and damages available	Rich	0.2	\$275.00	\$55.00
11/16/2015	Legal research re: treble damages under SCPWA	Rich	0.3	\$275.00	\$82.50
11/16/2015	Reviewed JK's initial damages calculations for Elvis Moodie	Rich	0.5	\$275.00	\$137.50
11/17/2015	Email to FLECTS counsel re: scheduling depositions	Rich	0.1	\$275.00	\$27.50
11/17/2015	Email to opposing counsel re: timing of Ellis depo, Jamaica depositions	Rich	0.1	\$275.00	\$27.50
11/17/2015	Sent email to opposing counsel re scheduling depositions	Rich	0.1	\$275.00	\$27.50
11/17/2015	Meeting with ML, JK, CIM to discuss planning depositions, email production, other discovery issues	Rich	1	\$275.00	\$275.00
11/17/2015	Prepared and sent class action notice and opt-out form by email to all class members with known email addresses	Rich	0.4	\$275.00	\$110.00
11/18/2015	Email to FLECTS counsel re scheduling depositions in January	Rich	0.1	\$275.00	\$27.50
11/18/2015	Emails (2 at 0.1 each) to FLECTS counsel w/ 30(b)(6) topics and to schedule depositions	Rich	0.2	\$275.00	\$55.00
11/18/2015	Meeting with JK, ML to discuss opposing counsel's plans to file MSI plus scheduling upcoming depositions	Rich	0.5	\$275.00	\$137.50
11/18/2015	Phone call with FLECTS counsel Allison Wallrapp re: scheduling depositions of Perry Wells, 30(b)(6) designee	Rich	0.1	\$275.00	\$27.50
11/18/2015	Discussion with ML, JK re possibility of deposing Kiawah President Roger Warren	Rich	0.1	\$275.00	\$27.50
11/18/2015	Listened to VM from FLECTS's counsel re: scheduling depositions	Rich	0.1	\$275.00	\$27.50
11/18/2015	Email to CIM with details of depo logistics in Miami, Jamaica	Rich	0.1	\$275.00	\$27.50
11/18/2015	Discussion with CIM re: contacting clients to schedule depositions in Miami, Jamaica	Rich	0.1	\$275.00	\$27.50
11/18/2015	Discussion with ML re: staffing of depositions in Miami, Jamaica	Rich	0.2	\$275.00	\$55.00
11/18/2015	Email to opposing counsel re: timing of depositions in Miami and Jamaica	Rich	0.1	\$275.00	\$27.50
11/18/2015	Convo w/ JK re: FLECTS depo subjects, logistics of depositions in Miami and Jamaica	Rich	0.3	\$275.00	\$82.50
11/19/2015	Email to opposing counsel attaching joint motion to extend discovery deadlines and proposed order	Rich	0.1	\$275.00	\$27.50
11/19/2015	Finalized draft of proposed order granting motion to extend deadlines per ML's suggestions	Rich	0.1	\$275.00	\$27.50
11/19/2015	Finalized draft of joint motion to extend deadlines per ML's and JK's suggestions	Rich	0.3	\$275.00	\$82.50
11/19/2015	Emailled Notice of completion of mailing class action notices to co-counsel for filing	Rich	0.1	\$275.00	\$27.50

11/19/2015	Phone call with Plaintiff Desmond Ellis to discuss deposition date	Rich	0.1	\$275.00	\$27.50
11/19/2015	Drafted proposed order granting joint motion to extend discovery deadline	Rich	0.2	\$275.00	\$55.00
11/19/2015	Finalized draft notice of completion of mailing class action notices and opt-out forms	Rich	0.1	\$275.00	\$27.50
11/19/2015	Drafted joint motion to extend discovery and dispositive motion deadlines	Rich	0.4	\$275.00	\$110.00
11/20/2015	Call from FLECTS counsel re: depo dates	Rich	0.1	\$275.00	\$27.50
11/20/2015	Email to opposing counsel re: FLECTS depo date	Rich	0.1	\$275.00	\$27.50
11/20/2015	Sent motion to extend deadlines and proposed order to co-counsel for filing	Rich	0.1	\$275.00	\$27.50
11/20/2015	Finalized joint motion and proposed order for filing	Rich	0.1	\$275.00	\$27.50
11/20/2015	Email to opposing counsel re: joint motion to extend deadlines	Rich	0.1	\$275.00	\$27.50
11/20/2015	Call with FLECTS counsel re: depo dates	Rich	0.1	\$275.00	\$27.50
11/20/2015	Call with FLECTS counsel re: depo dates	Rich	0.1	\$275.00	\$27.50
11/20/2015	Call with FLECTS's counsel re: potential depo date	Rich	0.1	\$275.00	\$27.50
11/23/2015	Call from FLECTS counsel re: depo dates	Rich	0.1	\$275.00	\$27.50
11/23/2015	Drafted deposition subpoenas for FLECTS and Perry Wells	Rich	0.3	\$275.00	\$82.50
11/23/2015	Reviewed samples of class action notices mailed to class members last week	Rich	0.1	\$275.00	\$27.50
11/23/2015	Gave cover letter and rog responses to admin for mailing to opposing counsel	Rich	0.1	\$275.00	\$27.50
11/23/2015	Email to opposing counsel sending responses to modified rogs 5 & 8	Rich	0.1	\$275.00	\$27.50
11/23/2015	Drafted, printed, signed & scanned cover letter to send responses to modified rogs 5 & 8	Rich	0.2	\$275.00	\$55.00
11/23/2015	Prepared responses to modified rogs 5 & 8 by Desmond, Elvis and Rayon to send to opposing counsel	Rich	0.5	\$275.00	\$137.50
11/23/2015	Call to FLECTS counsel re: depo dates in December	Rich	0.1	\$275.00	\$27.50
11/23/2015	Discussion of depo date options for FLECTS depo with ML	Rich	0.1	\$275.00	\$27.50
11/24/2015	Reviewed, coded FLECTS documents in Xera	Rich	2	\$275.00	\$530.00
11/24/2015	Updated subpoenas for Jessie Simpson, Beverly Wall, Jackie Regan with location information	Rich	0.1	\$275.00	\$27.50
11/24/2015	Sent email to opposing counsel re location of depositions in Charleston on Dec. 14-15	Rich	0.1	\$275.00	\$27.50
11/24/2015	Drafted depo subpoena for Jackie Regan	Rich	0.1	\$275.00	\$27.50
11/24/2015	Drafted depo subpoena for Beverly Wall	Rich	0.1	\$275.00	\$27.50
11/24/2015	Drafted depo subpoena for Jessie Simpson	Rich	0.1	\$275.00	\$27.50
11/24/2015	Began drafting outline of FLECTS 30(b)(6) depo	Rich	0.8	\$275.00	\$220.00
11/24/2015	Drafted outline for deposition of Perry Wells and FLECTS 30(b)(6)	Rich	1	\$275.00	\$275.00
11/25/2015	Email to FLECTS's counsel re: accepting subpoena, witness checks	Rich	0.2	\$275.00	\$55.00
11/25/2015	Email re availability of Miami office conference room for FLECTS depositions	Rich	0.1	\$275.00	\$27.50
11/25/2015	Email to opposing counsel re Jennifer Bozard depo rescheduling	Rich	0.1	\$275.00	\$27.50
11/25/2015	Discussion with ML, JK re discovery strategy, timing of depositions	Rich	0.2	\$275.00	\$55.00
11/25/2015	Edited draft of second set of rogs to Kiawah	Rich	0.1	\$275.00	\$27.50
11/25/2015	Edited list of 30(b)(6) topics for Kiawah per ML's suggestions	Rich	0.1	\$275.00	\$27.50
11/25/2015	Reviewed and coded FLECTS documents in Xera	Rich	0.5	\$275.00	\$137.50
11/28/2015	Email correspondence with opposing counsel re location of depositions in Jamaica	Rich	0.3	\$275.00	\$82.50
11/29/2015	Research into hotel accommodations for self and Plaintiff Collins-Ennis in Montego Bay	Rich	1	\$275.00	\$275.00
11/30/2015	Reviewed Defendant's expert witness designation documents	Rich	0.1	\$275.00	\$27.50
11/30/2015	Phone call to Plaintiff Fisher re logistics of meeting tomorrow and deposition Wednesday	Rich	0.2	\$275.00	\$55.00
11/30/2015	Phone call to Plaintiff Collins-Ennis re logistics of trip to Montego Bay tomorrow	Rich	0.2	\$275.00	\$55.00
11/30/2015	Email to opposing counsel re scheduling FLECTS depositions	Rich	0.1	\$275.00	\$27.50
11/30/2015	Discussion with JK re scheduling FLECTS depositions	Rich	0.1	\$275.00	\$27.50
11/30/2015	Discussion with ML re scheduling FLECTS depositions	Rich	0.1	\$275.00	\$27.50
11/30/2015	Sent Collins-Ennis responses to modified rogs and cover letter via email	Rich	0.1	\$275.00	\$27.50
11/30/2015	Prepared Collins-Ennis signed responses to modified rogs 5 & 8 and cover letter	Rich	0.3	\$275.00	\$82.50
12/1/2015	Meeting with clients Keisha Collins-Ennis and Rayon Fisher to prepare for depositions	Rich	1	\$275.00	\$275.00
12/1/2015	Travel from Atlanta to Montego Bay, Jamaica for deposition defense	Rich	6	\$275.00	\$1,650.00
12/1/2015	Deposition defense preparation - reviewing transcripts, making notes	Rich	1.5	\$275.00	\$412.50
12/2/2015	Travel from Hilton Rose Hall Resort to own hotel	Rich	0.3	\$275.00	\$82.50
12/2/2015	Defended deposition of Rayon Fisher	Rich	1.5	\$275.00	\$412.50
12/2/2015	Defended deposition of Keisha Collins-Ennis	Rich	2.7	\$275.00	\$742.50

12/2/2015	Travel from own hotel to Hilton Rose Hall Resort for deposition defense	Rich	0.3	\$275.00	\$82.50
12/3/2015	Travel from Montego Bay, Jamaica to Atlanta	Rich	6	\$275.00	\$1,650.00
12/4/2015	Discussion with ML re depositions of Collins-Ennis and Fisher, plans for depositions of Kiawah HR personnel, and depositions of Kiawah HR personnel	Rich	0.4	\$275.00	\$110.00
12/7/2015	Phone call with ML re upcoming depositions of Kiawah HR personnel	Rich	0.1	\$275.00	\$27.50
12/8/2015	Phone call with Plaintiff Desmond Ellis on progress of the case	Rich	0.1	\$275.00	\$27.50
12/8/2015	Conversation with JK re work product doctrine and opposing counsel claim that document is work product	Rich	0.1	\$275.00	\$27.50
12/8/2015	Email to opposing counsel re supplemental production in response to RFPs	Rich	0.1	\$275.00	\$27.50
12/8/2015	Email to opposing counsel re scheduling FLECTS depositions	Rich	0.1	\$275.00	\$27.50
12/8/2015	Email to FLECTS counsel re scheduling deposition	Rich	0.1	\$275.00	\$27.50
12/8/2015	Gave hard copies of cover letter, depo notices, subpoenas to admin for mailing to opposing counsel	Rich	0.1	\$275.00	\$27.50
12/8/2015	Sent email to opposing counsel serving notices of depo, subpoenas for J Simpson, B Wall, J Regan	Rich	0.1	\$275.00	\$27.50
12/8/2015	Email to JK, ML re expert report requirement and what Kiawah filed in this case	Rich	0.1	\$275.00	\$27.50
12/8/2015	Research re expert report requirement and what Kiawah filed in this case	Rich	0.1	\$275.00	\$27.50
12/8/2015	Drafted cover letter to opposing counsel re notices of deposition, subpoenas for J Simpson, B Wall, J Regan	Rich	0.1	\$275.00	\$27.50
12/8/2015	Prepared notices of deposition, finalized subpoenas for J Simpson, B Wall, J Regan	Rich	0.5	\$275.00	\$137.50
12/8/2015	Meeting with ML, JK re upcoming depositions, expert report	Rich	1.1	\$275.00	\$302.50
12/8/2015	Reviewed documents to prep for Jessie Simpson depo	Rich	0.8	\$275.00	\$220.00
12/9/2015	Prepared for deposition of Jessie Simpson - document review, drafting of outline	Rich	4	\$275.00	\$1,100.00
12/12/2015	Prepared for deposition of Jessie Simpson (reviewed and organized documents as potential exhibits)	Rich	5	\$275.00	\$1,375.00
12/12/2015	Phone call from Plaintiff Desmond Ellis; confirmed availability for depo in Miami on Jan. 29	Rich	0.1	\$275.00	\$27.50
12/13/2015	Traveled from Atlanta to Charleston to take depositions	Rich	5.5	\$275.00	\$1,512.50
12/13/2015	Prepared for deposition of Jessie Simpson (reviewing potential exhibits, revising outline)	Rich	2	\$275.00	\$550.00
12/14/2015	Discussion with ML to prepare for deposition of Jackie Regan	Rich	0.4	\$275.00	\$110.00
12/14/2015	Discussion with co-counsel of depositions of Jessie Simpson & Beverly Wall, and of potential for mediation	Rich	0.3	\$275.00	\$82.50
12/14/2015	Travel from Nexsen Puet office to hotel following depositions of Jessie Simpson, Beverly Wall	Rich	0.3	\$275.00	\$82.50
12/14/2015	Travel from hotel to Nexsen Puet office to depose Jessie Simpson	Rich	0.3	\$275.00	\$82.50
12/14/2015	Took deposition of Jessie Simpson	Rich	6	\$275.00	\$1,650.00
12/14/2015	Prepared for deposition of Jessie Simpson (organizing potential exhibits, reviewing outline)	Rich	1	\$275.00	\$275.00
12/14/2015	Travel from Charleston to Atlanta following depositions	Rich	5	\$275.00	\$1,375.00
12/15/2015	Discussion with ML and opposing counsel re potential dates for future depositions, payroll discovery issues	Rich	0.3	\$275.00	\$82.50
12/15/2015	Travel from hotel to Nexsen Puet office for deposition of Jackie Regan	Rich	0.3	\$275.00	\$82.50
12/16/2015	Email to FLECTS's counsel re her voicemail on 30(b)(6) concerns	Rich	0.1	\$275.00	\$27.50
12/16/2015	Research on SCPWA and rules re time and place of paying wages due	Rich	1	\$275.00	\$275.00
12/16/2015	Listened to VM from FLECTS's attorney re concerns about 30(b)(6) topics	Rich	0.1	\$275.00	\$27.50
12/16/2015	Email to SPLC Miami office administrator to reserve conference room for FLECTS, D. Ellis depositions	Rich	0.1	\$275.00	\$27.50
12/16/2015	Discussion with ML, JK re conference call with opposing counsel	Rich	0.2	\$275.00	\$55.00
12/16/2015	Conference call with opposing counsel re payroll discovery issues, mediation, deposition dates	Rich	0.9	\$275.00	\$247.50
12/16/2015	Discussion with ML, JK re depositions of Simpson, Wall & Regan and to prepare for phone call with opposing counsel	Rich	0.6	\$275.00	\$165.00
12/18/2015	Call with FLECTS's counsel re 30(b)(6) deposition	Rich	0.1	\$275.00	\$27.50
12/18/2015	Email to ML, JK summarizing results of research on expert report disclosure issue	Rich	0.2	\$275.00	\$55.00
12/18/2015	Researched requirement to serve expert report under FRCP	Rich	1	\$275.00	\$275.00
12/18/2015	Discussion with ML, JK re discovery issues, deposition scheduling	Rich	0.3	\$275.00	\$82.50
12/21/2015	Sent email to opposing counsel with deposition notices, subpoenas	Rich	0.1	\$275.00	\$27.50
12/21/2015	Gave cover letter, deposition notices & subpoenas to admin for mailing	Rich	0.1	\$275.00	\$27.50
12/21/2015	Prepared cover letter for deposition notices and subpoenas	Rich	0.1	\$275.00	\$27.50
12/21/2015	Prepared deposition subpoena for Jennifer Bozard	Rich	0.1	\$275.00	\$27.50
12/21/2015	Prepared deposition subpoena for Ken Tibbetts	Rich	0.1	\$275.00	\$27.50
12/21/2015	Prepared deposition subpoena for Karla Bujak	Rich	0.1	\$275.00	\$27.50
12/21/2015	Drafted deposition notice for Jennifer Bozard	Rich	0.1	\$275.00	\$27.50
12/21/2015	Drafted deposition notice for Ken Tibbetts	Rich	0.1	\$275.00	\$27.50
12/21/2015	Drafted deposition notice for Karla Bujak	Rich	0.1	\$275.00	\$27.50
12/21/2015	Sent email to opposing counsel re failure to produce expert report	Rich	0.1	\$275.00	\$27.50
12/22/2015	Drafted attachment to document subpoena for B. Perry Woodside	Rich	0.4	\$275.00	\$110.00



12/22/2015	Discussion w/ JK, DW re expert report, proposed expert testimony	Rich	0.2	\$275.00	\$55.00
12/22/2015	Reviewed expert report of B. Perry Woodside provided by opposing counsel	Rich	0.1	\$275.00	\$27.50
12/22/2015	Prepared hard copies of subpoenas and cover letter to FLECTS's counsel; gave to admin for mailing	Rich	0.1	\$275.00	\$27.50
12/22/2015	Prepared hard copies of depo notices, subpoenas, cover letters to mail to opposing counsel; gave to admin for mailing	Rich	0.1	\$275.00	\$27.50
12/22/2015	Sent e-mail to FLECTS's counsel re depositions of P. Wells, 30(b)(6)	Rich	0.1	\$275.00	\$27.50
12/22/2015	Sent e-mail to opposing counsel with depo notice, subpoena for R. Warren	Rich	0.1	\$275.00	\$27.50
12/22/2015	Drafted cover letter to FLECTS's counsel re depositions of Perry Wells, FLECTS 30(b)(6)	Rich	0.1	\$275.00	\$27.50
12/22/2015	Drafted cover letter to opposing counsel re depo of R. Warren	Rich	0.1	\$275.00	\$27.50
12/22/2015	Drafted notice of 30(b)(6) deposition for FLECTS	Rich	0.1	\$275.00	\$27.50
12/22/2015	Edited 30(b)(6) deposition subpoena for FLECTS	Rich	0.1	\$275.00	\$27.50
12/22/2015	Drafted deposition subpoena for Perry Wells	Rich	0.1	\$275.00	\$27.50
12/22/2015	Drafted deposition subpoena for Roger Warren	Rich	0.1	\$275.00	\$27.50
12/22/2015	Drafted deposition notice for Perry Wells	Rich	0.1	\$275.00	\$27.50
12/22/2015	Drafted deposition notice for Roger Warren	Rich	0.1	\$275.00	\$27.50
12/23/2015	Legal research re exclusion of experts in 4CA, D.S.C. and re experts proffering legal conclusions	Rich	0.8	\$275.00	\$220.00
12/23/2015	Drafted memo of law in support of motion to exclude B. Perry Woodside	Rich	0.5	\$275.00	\$137.50
12/23/2015	Gave hard copies of cover letter, 2d set RFPs to admin for mailing	Rich	0.1	\$275.00	\$27.50
12/23/2015	Sent e-mail to opposing counsel re 2d set RFPs, document subpoena for B. Perry Woodside	Rich	0.1	\$275.00	\$27.50
12/23/2015	Drafted cover letter to opposing counsel serving second set of RFPs	Rich	0.1	\$275.00	\$27.50
12/23/2015	Drafted Plaintiffs' Second Set of RFPs	Rich	0.5	\$275.00	\$137.50
12/23/2015	Prepared document subpoena for B. Perry Woodside	Rich	0.1	\$275.00	\$27.50
12/23/2015	Finalized attachment to subpoena for B. Perry Woodside	Rich	0.3	\$275.00	\$82.50
12/23/2015	Meeting with ML, JK to discuss expert report, discovery issues, depositions	Rich	0.4	\$275.00	\$110.00
12/23/2015	Began drafting motion to exclude expert and memo in support	Rich	0.3	\$275.00	\$82.50
12/23/2015	Research re sufficiency of expert report	Rich	0.4	\$275.00	\$110.00
1/5/2016	Emails (2 at 0.1 each) to ML, JK re response to privilege log	Rich	0.2	\$275.00	\$55.00
1/5/2016	Reviewed updated privilege log and recently produced emails	Rich	0.1	\$275.00	\$27.50
1/6/2016	Sent signed mediation confirmation letter to mediator via email	Rich	0.1	\$275.00	\$27.50
1/6/2016	Signed mediation confirmation letter, obtained signatures from JK and ML, scanned signed copy	Rich	0.1	\$275.00	\$27.50
1/6/2016	Email to co-counsel N. Bloodgood re reasonable hourly rates and their fees & costs	Rich	0.1	\$275.00	\$27.50
1/6/2016	Meeting with JK, ML to discuss discovery issues and upcoming mediation	Rich	0.2	\$275.00	\$55.00
1/6/2016	Reviewed documents to prepare for K. Tibbetts depo	Rich	2	\$275.00	\$550.00
1/7/2016	Drafted mediation statement	Rich	4.5	\$275.00	\$1,237.50
1/7/2016	Prepared cover letter to send confidential mediation statement to mediator	Rich	0.1	\$275.00	\$27.50
1/7/2016	Edited ML's draft letter to opposing counsel re discovery disputes	Rich	0.3	\$275.00	\$82.50
1/7/2016	Discussion with ML, JK re pre-employment expenses, mediation	Rich	0.2	\$275.00	\$55.00
1/7/2016	Drafted paragraph on unilateral redaction of meeting minutes to include in letter to opposing counsel re various discovery	Rich	0.2	\$275.00	\$55.00
1/7/2016	Drafted paragraph on response to rog 21 for letter to opposing counsel	Rich	0.2	\$275.00	\$55.00
1/8/2016	Phone call with opposing counsel re privilege log, redactions	Rich	0.5	\$275.00	\$137.50
1/8/2016	Updated confidential mediation statement per ML's edits, JK's damages calculations	Rich	0.9	\$275.00	\$247.50
1/8/2016	Document review in Xera to prep for depo of Ken Tibbetts	Rich	1	\$275.00	\$275.00
1/8/2016	Email to opposing counsel attaching letter re discovery disputes	Rich	0.1	\$275.00	\$27.50
1/8/2016	Finalized letter to opposing counsel re discovery disputes	Rich	0.1	\$275.00	\$27.50
1/8/2016	Drafted draft of confidential mediation statement per JK's suggested edits	Rich	0.4	\$275.00	\$110.00
1/8/2016	Email to mediator re structure of mediation	Rich	0.1	\$275.00	\$27.50
1/9/2016	Prepared for deposition of Ken Tibbetts - drafted outline, reviewed documents	Rich	1.8	\$275.00	\$495.00
1/9/2016	Updated draft mediation statement with fees & costs calculation	Rich	0.1	\$275.00	\$27.50
1/9/2016	Prepared for deposition of Ken Tibbetts -- document review, outline drafting	Rich	3	\$275.00	\$825.00
1/10/2016	Edited Plaintiffs' confidential mediation statement	Rich	0.2	\$275.00	\$55.00
1/10/2016	Legal research on South Carolina Payment of Wages Act	Rich	0.2	\$275.00	\$55.00
1/10/2016	Travel from Atlanta to Charleston	Rich	6	\$275.00	\$1,650.00
1/10/2016	Preparing potential exhibits for deposition of Ken Tibbetts	Rich	2	\$275.00	\$550.00
1/11/2016	Edited Plaintiffs' Confidential Mediation Statement	Rich	0.2	\$275.00	\$55.00



1/12/2016	Travel from deposition of Ken Tibbetts to hotel	Rich	0.3	\$275.00	\$82.50
1/12/2016	Legal research on tips under the FLA and SCPWA	Rich	1	\$275.00	\$275.00
1/12/2016	Took deposition of Ken Tibbetts	Rich	5.3	\$275.00	\$1,457.50
1/12/2016	Travel from hotel to deposition of Ken Tibbetts	Rich	0.3	\$275.00	\$82.50
1/12/2016	Prepared for deposition of Ken Tibbetts	Rich	1	\$275.00	\$275.00
1/12/2016	Prepared for deposition of Ken Tibbetts	Rich	0.5	\$275.00	\$137.50
1/12/2016	Travel from deposition of Karla Bujak to hotel	Rich	0.3	\$275.00	\$82.50
1/12/2016	Travel from hotel to deposition of Karla Bujak	Rich	0.3	\$275.00	\$82.50
1/12/2016	E-mailed confidential mediation statement and supporting documents to mediator	Rich	0.1	\$275.00	\$27.50
1/13/2016	Travel from Charleston to Atlanta	Rich	6.5	\$275.00	\$1,787.50
1/14/2016	Meeting with JK, ML to discuss continued settlement discussions, plan for deposition of Jennifer Bozard	Rich	0.5	\$275.00	\$137.50
1/14/2016	Reviewed documents to prepare for deposition of Jennifer Bozard	Rich	2	\$275.00	\$550.00
1/15/2016	Reviewed depo transcripts from Simpson, Wall & Regan to prepare for J Bozard depo	Rich	0.8	\$275.00	\$220.00
1/15/2016	Reviewed documents to prepare for J. Bozard deposition	Rich	2	\$275.00	\$550.00
1/15/2016	Discussions with ML, JK re deposition of J. Bozard. Kiawah pay practices for tipped employees	Rich	0.4	\$275.00	\$110.00
1/16/2016	Reviewed depo exhibits 73-83 to prep for J Bozard depo	Rich	0.2	\$275.00	\$55.00
1/16/2016	Reviewed Defendant's supplemental production from last week to prepare for J. Bozard depo	Rich	0.8	\$275.00	\$220.00
1/17/2016	Assist with exhibit selection, printing, sorting for J. Bozard deposition	Rich	2.5	\$275.00	\$687.50
1/17/2016	Preparing exhibit folders for J. Bozard deposition	Rich	1	\$275.00	\$275.00
1/17/2016	Sorting, reviewing, printing documents to prepare for J. Bozard deposition	Rich	2	\$275.00	\$550.00
1/18/2016	Organizing, printing, reviewing documents for J. Bozard deposition	Rich	2	\$275.00	\$550.00
1/20/2016	Email to FLECTS counsel re depositions next week	Rich	0.1	\$275.00	\$27.50
1/21/2016	Drafted motion for leave to amend for Second Amended Complaint	Rich	2.3	\$275.00	\$632.50
1/21/2016	Email to opposing counsel sending updated draft joint notice of mediation	Rich	0.1	\$275.00	\$27.50
1/21/2016	Updated draft of joint notice of mediation	Rich	0.1	\$275.00	\$27.50
1/21/2016	Discussion with ML and JK re settlement negotiations, SCPWA claims	Rich	0.2	\$275.00	\$55.00
1/21/2016	E-mailed opposing counsel re joint notice of completion of mediation	Rich	0.1	\$275.00	\$27.50
1/21/2016	Drafted joint notice of completion of mediation	Rich	0.3	\$275.00	\$82.50
1/21/2016	Braunstormed goals for FLECTS depositions	Rich	0.2	\$275.00	\$55.00
1/21/2016	Listened to VM from FLECTS counsel re upcoming depositions	Rich	0.1	\$275.00	\$27.50
1/22/2016	Worked on FLECTS deposition outlines	Rich	0.5	\$275.00	\$137.50
1/22/2016	Continued drafting memo in support of motion for leave to amend, including legal research	Rich	1.8	\$275.00	\$495.00
1/22/2016	Emailed joint notice of mediation to co-counsel for filing	Rich	0.1	\$275.00	\$27.50
1/22/2016	Finalized joint notice of mediation for filing	Rich	0.1	\$275.00	\$27.50
1/22/2016	Email to opposing counsel confirming version of joint notice of mediation to be filed	Rich	0.1	\$275.00	\$27.50
1/23/2016	Updated draft of memo in support of motion to amend	Rich	4.5	\$275.00	\$1,237.50
1/23/2016	Prepared for FLECTS depositions	Rich	1	\$275.00	\$275.00
1/24/2016	Prepared for depositions of FLECTS	Rich	2	\$275.00	\$550.00
1/25/2016	Prepared for FLECTS depositions - drafted outlines	Rich	1.3	\$275.00	\$357.50
1/25/2016	Discussion with JK re settlement negotiations, moving to amend scheduling order	Rich	0.1	\$275.00	\$27.50
1/25/2016	Emailed proposed order granting motion for leave to file second amended complaint to co-counsel	Rich	0.1	\$275.00	\$27.50
1/25/2016	Drafted proposed order granting motion for leave to file second amended complaint	Rich	0.4	\$275.00	\$110.00
1/25/2016	Email to co-counsel sending motion and supporting docs for filing	Rich	0.1	\$275.00	\$27.50
1/25/2016	Email to opposing counsel sending updated notices of deposition for B. Perry Woodside and Roger Warren	Rich	0.1	\$275.00	\$27.50
1/25/2016	Drafted notices of deposition for Roger Warren and B. Perry Woodside at new times	Rich	0.2	\$275.00	\$55.00
1/25/2016	Finalized motion for leave to amend and other documents for filing	Rich	0.2	\$275.00	\$55.00
1/25/2016	Emails to CIM (2 at 0.1 each) re creation of exhibits for motion for leave to amend	Rich	0.2	\$275.00	\$55.00
1/25/2016	Updated drafts of motion for leave to amend and memo in support thereof per JK's edits	Rich	0.4	\$275.00	\$110.00
1/25/2016	Read, edited JK's draft of second amended complaint	Rich	0.4	\$275.00	\$110.00
1/25/2016	Discussion with DW re: 30(b)(6) depositions to prepare for FLECTS depositions	Rich	0.2	\$275.00	\$55.00
1/25/2016	Updated draft of motion for leave to amend and memo in support thereof based on JK's edits and additional legal research	Rich	1.8	\$275.00	\$495.00
1/25/2016	Reviewed supplemental production documents produced by Defendant	Rich	0.3	\$275.00	\$82.50

1/26/2016	Prepared for depositions of FLECTS designees - finalized outlines, reviewed documents, created exhibits	Rich	2.8	\$275.00	\$770.00
1/26/2016	Prepared for deposition of B. Perry Woodside - drafted outline, reviewed subpoena docs	Rich	4.5	\$275.00	\$1,237.50
1/26/2016	Email to opposing counsel sending depo subpoena of B. Perry Woodside	Rich	0.1	\$275.00	\$27.50
1/26/2016	Prepared deposition subpoena for B. Perry Woodside	Rich	0.1	\$275.00	\$27.50
1/26/2016	Prepared materials on expert testimony to prepare for deposition of B. Perry Woodside	Rich	2	\$275.00	\$550.00
1/26/2016	Reviewed materials on expert testimony to prepare for deposition of B. Perry Woodside	Rich	0.7	\$275.00	\$192.50
1/27/2016	Prepared for depositions of FLECTS 30(b)(6) designees	Rich	1	\$275.00	\$275.00
1/27/2016	Travel from Atlanta to Miami for depositions	Rich	5	\$275.00	\$1,375.00
1/27/2016	Discussion with JK, ML re: Kiawah 30(b)(6) deposition topics	Rich	0.5	\$275.00	\$137.50
1/28/2016	With ML, prepped Plaintiff Desmond Ellis for deposition	Rich	2	\$275.00	\$550.00
1/28/2016	Deposed Joe Hobbs of FLECTS	Rich	1.5	\$275.00	\$412.50
1/28/2016	Deposed Perry Wells of FLECTS	Rich	3	\$275.00	\$825.00
1/29/2016	Travel from Miami to Atlanta following depositions	Rich	5	\$275.00	\$1,375.00
1/30/2016	Email to JK, ML re various discovery issues inc motion for extension, BPW documents	Rich	0.1	\$275.00	\$27.50
1/31/2016	Travel from Atlanta to Charleston, SC for depositions	Rich	5.5	\$275.00	\$1,512.50
1/31/2016	Prepared for depo of B Perry Woodside - prepared exhibits, finalized outline	Rich	3	\$275.00	\$825.00
1/31/2016	Prepared for deposition of B. Perry Woodside - finalize draft outline, prepared potential exhibits	Rich	8.5	\$275.00	\$2,337.50
2/1/2016	Read Defendant's response to motion to amend	Rich	0.1	\$275.00	\$27.50
2/1/2016	Deposed B. Perry Woodside	Rich	4	\$275.00	\$1,100.00
2/2/2016	Travel from Charleston, SC back to Atlanta	Rich	4.5	\$275.00	\$1,237.50
2/3/2016	Call to opposing counsel to discuss discovery issues, Daubert motion	Rich	0.1	\$275.00	\$27.50
2/3/2016	Email to York Flik (FLECTS's counsel) re Joe Hobbs, Robert Morrison	Rich	0.1	\$275.00	\$27.50
2/3/2016	Left VM for FLECTS's counsel York Flik re Joe Hobbs deposition issue, also Robert Morrison issue	Rich	0.1	\$275.00	\$27.50
2/3/2016	Left VM for opposing counsel re Joe Hobbs depo and additional information	Rich	0.1	\$275.00	\$27.50
2/3/2016	Meeting with JK, ML re schedule for SJ and Daubert motion drafting	Rich	1	\$275.00	\$275.00
2/10/2016	Read, coded Ken Tibbetts depo transcript to prepare for MSJs	Rich	1.5	\$275.00	\$412.50
2/11/2016	Legal research re Daubert motion	Rich	0.7	\$275.00	\$192.50
2/11/2016	Discussion with JK, ML re ongoing settlement efforts	Rich	0.2	\$275.00	\$55.00
2/11/2016	Read, coded deposition transcript of Perry Wells	Rich	1.6	\$275.00	\$440.00
2/11/2016	Read and code depo transcript of Jessie Simpson for MSJs	Rich	2.5	\$275.00	\$687.50
2/11/2016	Read and code depo transcript of B Perry Woodside	Rich	1	\$275.00	\$275.00
2/11/2016	Legal research for Daubert motion	Rich	1	\$275.00	\$275.00
2/12/2016	Read, coded depo transcript of Joe Hobbs	Rich	0.5	\$275.00	\$137.50
2/12/2016	Discussion with JK, ML re SCPWA	Rich	0.2	\$275.00	\$55.00
2/12/2016	Read, coded depo transcript of B Perry Woodside	Rich	1	\$275.00	\$275.00
2/16/2016	Began drafting Arriaga and SPWD sections of MSJ	Rich	3.7	\$275.00	\$1,017.50
2/16/2016	Email to FLECTS's counsel re Joe Hobbs declaration	Rich	0.1	\$275.00	\$27.50
2/16/2016	Email to JK re Joe Hobbs draft declaration	Rich	0.1	\$275.00	\$27.50
2/16/2016	Reviewed draft declaration from Joseph Hobbs	Rich	0.1	\$275.00	\$27.50
2/16/2016	Read and coded depo transcript of Keisha Collins-Ennis	Rich	1	\$275.00	\$275.00
2/16/2016	Read and code depo transcript of Payton Thomas	Rich	0.8	\$275.00	\$220.00
2/17/2016	Read and coded depo transcript of Rayon Fisher	Rich	0.8	\$275.00	\$220.00
2/17/2016	Read and coded depo transcript of Michelle Francis	Rich	0.8	\$275.00	\$220.00
2/18/2016	Reviewed, edited joint motion and proposed order re Ellis's depo and 5A privilege	Rich	0.1	\$275.00	\$27.50
2/18/2016	Drafted SCPWA section on pre-employment expenses, including legal research	Rich	2	\$275.00	\$550.00
2/18/2016	Drafted FLISA Arriaga section of motion for summary judgment	Rich	2.5	\$275.00	\$687.50
2/19/2016	Email to opposing counsel re correcting Hobbs depo testimony through errata sheet	Rich	0.1	\$275.00	\$27.50
2/21/2016	Drafted SCPWA and contract sections on pre-employment expenses	Rich	3.5	\$275.00	\$962.50
2/22/2016	Read, edited ML's draft opposition to D's motion for extension of opt-out period	Rich	0.8	\$275.00	\$220.00
2/22/2016	Drafted and did legal research for motion to exclude expert	Rich	3	\$275.00	\$825.00
2/22/2016	Did legal research and drafted contract section of pre-employment expenses argument for MSJ	Rich	1	\$275.00	\$275.00
2/22/2016	Drafted contracts sections of Arriaga, SPWD arguments in MSJ	Rich	1.5	\$275.00	\$412.50
2/25/2016	Reviewed confidential designations for B Perry Woodside depo, brainstormed bases for challenging them	Rich	0.6	\$275.00	\$165.00

2/27/2016	Drafted memo in support of motion to exclude Defendant's expert	Rich	7	\$275.00	\$1,925.00
2/29/2016	Did legal research for and drafted memo in support of motion to exclude expert	Rich	2	\$275.00	\$550.00
2/29/2016	Drafted memo in support of motion to exclude expert	Rich	4.6	\$275.00	\$1,265.00
3/1/2016	Email to opposing counsel re declaration or errata sheet for amending Hobbs depo	Rich	0.1	\$275.00	\$27.50
3/1/2016	Emails (2 at 0.1 each) with FLECTS's counsel re amending Hobbs depo	Rich	0.2	\$275.00	\$55.00
3/1/2016	Drafted motion for summary judgment	Rich	0.1	\$275.00	\$27.50
3/1/2016	Began drafting memorandum of law in support of motion for summary judgment	Rich	0.5	\$275.00	\$137.50
3/1/2016	Drafted motion to exceed page limitations	Rich	0.5	\$275.00	\$137.50
3/1/2016	Finalized draft of memo in support of motion to exclude expert	Rich	4	\$275.00	\$1,100.00
3/2/2016	Drafted letter challenging confidentiality designations in BPWIII transcript	Rich	0.8	\$275.00	\$220.00
3/3/2016	Emailled letter challenging confidentiality designations to opposing counsel	Rich	0.1	\$275.00	\$27.50
3/3/2016	Finalized letter to opposing counsel challenging confidential designations in expert depo	Rich	0.2	\$275.00	\$55.00
3/4/2016	Meeting with JK, ML, DW to discuss mediation strategy	Rich	0.7	\$275.00	\$192.50
3/8/2016	Drafted updated confidential mediation statement to send to mediator in advance of Friday's mediation	Rich	0.7	\$275.00	\$192.50
3/9/2016	Discussion with J Knoepp re settlement negotiation and mediation strategy	Rich	0.1	\$275.00	\$27.50
3/9/2016	Meeting with J Knoepp, C Martinez, D Werner to discuss new settlement offer and strategy for upcoming mediation	Rich	0.3	\$275.00	\$82.50
3/10/2016	Travel from Atlanta, GA to Charleston, SC to attend mediation	Rich	5	\$275.00	\$1,375.00
3/11/2016	Attend, participate in mediation in Charleston, SC	Rich	8	\$275.00	\$2,200.00
3/12/2016	Travel from Charleston, SC to Atlanta, GA after mediation	Rich	5	\$275.00	\$1,375.00
3/17/2016	Reviewed draft motion to stay deadlines	Rich	0.3	\$275.00	\$82.50
3/17/2016	Reviewed draft motion to stay deadlines	Rich	0.1	\$275.00	\$27.50
3/17/2016	Reviewed draft motion to stay deadlines	Rich	0.9	\$275.00	\$247.50
3/17/2016	Reviewed, edited J Knoepp's draft joint motion for preliminary approval of settlement	Rich	0.3	\$275.00	\$82.50
4/18/2016	Reviewed, edited J Knoepp's draft motion and order for preliminary approval of settlement	Rich	0.2	\$275.00	\$55.00
4/18/2016	Drafted paragraph on redacting settlement exhibit, added to edited version of memo in support of motion for preliminary approval	Rich	0.3	\$275.00	\$82.50
4/18/2016	Researched and began drafting motion to seal exhibit to proposed settlement	Rich	1.5	\$275.00	\$412.50
4/19/2016	Edited Defendant's draft of proposed settlement agreement	Rich	0.6	\$275.00	\$165.00
5/31/2016	Updated draft of memo in support of motion to partially seal proposed class action settlement agreement	Rich	0.4	\$275.00	\$110.00
5/31/2016	Drafted updated joint motion to partially seal plus all supporting docs including memo of law	Rich	2	\$275.00	\$550.00
6/1/2016	Finalized memo in support of motion to partially seal per J Knoepp's suggested edits	Rich	0.5	\$275.00	\$137.50
6/6/2016	Drafted proposed order granting joint motion to partially seal settlement agreement	Rich	0.3	\$275.00	\$82.50
6/6/2016	Discussion w J Knoepp re filing motion to partially seal settlement agreement	Rich	0.1	\$275.00	\$27.50
11/30/2016	Read, edited J Knoepp's draft memo in support of motion to grant settlement	Rich	0.4	\$275.00	\$110.00